

ORAL ARGUMENT NOT YET SCHEDULED

No. 23-1175 (L), 23-1222

**UNITED STATES COURT OF APPEALS FOR THE DISTRICT
OF COLUMBIA CIRCUIT**

CITY OF PORT ISABEL, *et al.*,*Petitioners,*

v.

FEDERAL ENERGY REGULATORY COMMISSION,

Respondent.

On Petition for Review of Orders of the
Federal Energy Regulatory Commission

**PETITIONERS' JOINT MOTION TO MODIFY BRIEFING
SCHEDULE**

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Dated March 1, 2024

**CERTIFICATE AS TO PARTIES, RULINGS,
AND RELATED CASES**

A. Parties

1. Petitioners

City of Port Isabel

No Rule 26.1 Corporate Disclosure Statement is required for Petitioner City of Port Isabel, a governmental entity.

Sierra Club

Sierra Club has no parent companies, and there are no publicly held companies that have a 10 percent or greater ownership interest in it. Sierra Club is a nonprofit corporation organized and existing under the laws of the State of California, dedicated to the protection and enjoyment of the environment.

**Vecinos para el Bienestar de la Comunidad
Costera**

Vecinos para el Bienestar de la Comunidad Costera (“Vecinos”) has no parent companies, and there are no parent companies that have a 10 percent or greater ownership interest in Vecinos.

Vecinos, an association organized and existing under the laws of the State of Texas, is an unincorporated nonprofit association dedicated

to protecting and improving the health, standard of living, and economic development of the coastal community in the Rio Grande Valley of South Texas.

2. Respondent

Federal Energy Regulatory Commission

3. Respondent-Intervenors

Texas LNG Brownsville, LLC

B. Rulings Under Review

1. Order on Remand, *Texas LNG Brownsville, LLC*, 183 FERC ¶ 61,047 (Apr. 21, 2023).
2. Order Addressing Arguments Raised On Rehearing, *Texas LNG Brownsville, LLC*, 185 FERC ¶ 61,079 (Oct. 27, 2023).

C. Statement of Related Cases

Pursuant to Circuit Rule 28(a)(1)(C), the undersigned states that some of the issues raised in this case are similar to the issues raised in the following case:

1. *City of Port Isabel, et al. v. FERC*, D.C. Circuit Case Nos. 23-1174 (L) and 23-1221 (concerning Rio Grande LNG, LLC, *et al.* FERC Dkt. CP16-454, *et al.*). On November 16, 2023, the

Court Clerk granted FERC's motion to calendar that case and this one before the same panel. (ECF No. 2027350)

MOTION TO MODIFY BRIEFING SCHEDULE

Petitioners Vecinos para el Bienestar de la Comunidad Costera *et al.* (“Vecinos”) move to modify this case’s briefing schedule. FERC and Texas LNG do not oppose this motion.

On November 16, 2023, the Court Clerk granted FERC’s motion to calendar this case for argument together with *City of Port Isabel, et al. v. FERC*, D.C. Circuit Case Nos. 23-1174 (L). On March 1, 2024, the Court modified the briefing schedule in that case. Per Curiam Order, *City of Port Isabel et al.*, No. 23-1174 (L), Doc. #2043027 (March 1, 2024). To ensure that these cases can be argued together consistent with the updated briefing schedule there, Vecinos now moves to modify this briefing schedule accordingly. Specifically, Vecinos seek the following modifications of the briefing schedule, and for this case, like 23-1174, to be calendared “for argument on the first appropriate date following the conclusion of briefing.” *Id.* at 2.

	Previous Deadline	New Deadline
Deferred Appendix	March 19, 2024	March 15, 2024
Final Briefs	April 2, 2024	March 26, 2024

CONCLUSION

For the reasons stated above, Vecinos respectfully request that the Court grant this motion.

Dated: March 1, 2024

Respectfully submitted,

/s/ Thomas Gosselin

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CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure Rule 27(d) and 32(a), I certify that the foregoing motion complies with:

1. the type-volume limitations established by Rule 27(d)(2)(A), because this motion contains 195 words; and
2. the typeface requirements of Rule 32(a)(5) and the type style requirements of Rule 32(a)(6) because it has been prepared in a proportionally spaced typeface (14-point) using Microsoft Word (the same program used to calculate the word count).

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March, 2024, I have served the foregoing Motion to Expedite on all registered counsel through the Court's electronic filing system (ECF).

/s/ Thomas Gosselin

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